



LitigationSword Orel LLC
Sergei Orel LLC,
Attorney at Law
2125 Center Avenue, Suite 608
Fort Lee, New Jersey 07024
Tel: 201-491-1464
Tel: 917 277-8806

April 25, 2022

VIA ECF

The Honorable Diane Gujarati
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
Courtroom: 4B South

Re: Dreamr Labs Limited v. Delchain Limited, et al., Case No. 22-cv-1332-DG-TAM

Dear Judge Gujarati:

We are counsel for plaintiff in this action. We write in reply to the April 18, 2022 correspondence submitted by counsel for defendants Delchain Limited and Deltec Bank & Trust Limited (the "Defendants"), wherein Defendants' counsel requests a pre-motion conference with respect to a proposed motion to dismiss.

After filing and serving the complaint, other named defendants have contacted us concerning the possible resolution of certain matters that may impact this litigation, in general, and Defendants, in particular.

Therefore, we hereby respectfully request a ten-business day extension of time to explore all options in connection with this litigation, and thereafter either seek to amend the complaint or otherwise address and resolve the concerns raised by Defendants and their counsel.

We look forward to addressing any questions or concerns and thank the court for its attention to this matter.

Very truly yours,

/s/ Reeves Carter